

DATE	ATTY/PARA	TIME	DESCRIPTION
10/27/03	SAV	1.70	Prepare of status of notice chart; cross-check same against TLG package of class member letters for completeness
10/28/03	JCM	2.90	Prepare for and participate in IP phone conference with Court; conference with TLG re: same; follow up re: discovery per Court order
10/28/03	TLG	7.80	Prepare for conference with the Court re: Defendant's calculations of severance benefits and omission of vacation pay; phone conference with the Court re: same; conference with JCM re: same; draft letter to send to the class members regarding their disputes of Defendant's calculations of benefits; review and revise same; draft, review and revise Plaintiffs' Interrogatories and Requests for Production of Documents
10/29/03	JCM	2.70	Conference with TLG re: IP discovery requests; research re: required scope of plaintiffs counsel for class discovery due to IP specific requests; review of requests; review/edit of class notice letter regarding vacation policy; review of correspondence to opposing counsel
10/29/03	TLG	9.20	Review and revise letter to class members and transmit to defense counsel re: getting approval of the same; draft, review and revise Plaintiffs' Interrogatories and Requests for Production of Documents; conference with JCM re: same; phone conference with clients re: same; review file and compile exhibits in support of vacation pay; letter transmitting same to defense counsel with request for employee correspondence to and from Barger
10/29/03	SAV	2.00	File review: review and copy documents re: class member disputes
10/31/03	TLG	1.70	Review Defendant's Interrogatories and Request for Production of Documents; draft responses re: same; review Defendant's subpoena duces tecum and notice of deposition directed to Smart Papers
11/01/03	JCM	.70	Review of International Paper discovery subpoenas
11/03/03	SAV	.20	Update status of notice chart

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11/04/03	SAV	.10	Telephone conference with client re: receipt of notice
11/06/03	SAV	4.00	File review: review administrative record for reference to class members' claims
11/07/03	SAV	5.50	File review: Administrative Record; prepare exhibit re: vacation benefit claims
11/10/03	TLG	8.00	Draft motion for court approval of class communication; review and revise same; prepare attachments for same; draft and revise Plaintiffs' Responses to Defendant's Interrogatories and Requests for Production of Documents; phone conference with clients re: same; conference with JCM re: same; conference with SAV re: same
11/10/03	JCM	.30	Conference with TLG re: Plaintiffs' Responses to Defendant's Discovery Requests
11/10/03	SAV	5.80	File review: review Administrative Record; prepare chart re: benefit claims; telephone conference with class member re: good address; Conference with TLG re: Plaintiffs' Responses to Defendant's Interrogatories and Document Requests
11/11/03	TLG	6.70	Review and revise Plaintiffs' Motion for Court Approval of Class Communication; finalize same and finalize exhibits thereto; draft and revise Plaintiffs' Responses to Defendant's Interrogatories and Requests for Production of Documents; phone conference with clients re: same; conference with JCM re: same; conference with SAV re: same
11/11/03	JCM	.50	Conference with TLG re: discovery issues and communications with the class
11/11/03	SAV	4.00	File review: Administrative Record; prepare chart re: benefit claims; discussion with TLG re: discovery; prepare discovery responses
11/12/03	TLG	4.50	Draft and revise Plaintiffs' Responses to Defendant's Interrogatories and Requests for Production of Documents; phone conference with clients re: same; conference with JCM re: same; conference with SAV re: same

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11/12/03	JCM	.30	Conference with TLG re: Plaintiffs' Responses to Defendant's Interrogatories and Requests for Production of Documents
11/12/03	SAV	.50	Revise exhibits to discovery responses; prepare Exhibit for discovery response; conference with TLG re: same
11/14/03	TLG	.50	Review Defendant's Response to Plaintiffs' Motion for Class Notice and Defendant's requested revisions to the proposed Notice; conference with JCM re: same
11/14/03	JCM	.20	Conference with TLG re: Defendant's revisions to the proposed notice to the class
11/17/03	TLG	1.80	Review Court Order approving Notice for distribution to class members; conference with JCM and SAV re: sending the Notice to all class members; review file and assemble exhibits and evidence in support of inclusion of vacation pay as damages
11/17/03	JCM	.50	Conference with TLG and SAV re: sending notice to the class
11/17/03	SAV	.50	Conference with TLG and JCM re: sending Notice to the class
11/18/03	TLG	.80	Review file and assemble exhibits and evidence in support of inclusion of vacation pay as damages; draft and revise letter to defense counsel McElligott re: vacation pay discovery issues; conference with JCM re: correspondence with McElligott
11/18/03	JCM	.20	Review of correspondence to opposing counsel, with follow-up with TLG
11/18/03	SAV	3.00	Type notice letter; update status of notice letter with info re: update
11/19/03	TLG	1.20	Finalize letter to class members informing them of the status of the benefits dispute; conference with JCM re: strategy
11/19/03	JCM	.70	Review edit of correspondence sent to class members per Court Order; conference with TLG on case matters

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11/19/03	SAV	.90	Prepare mailing to class members re: update
11/21/03	TLG	.30	Review defense counsel McElligott's letter re: vacation pay discovery issues
11/25/03	SAV	.40	Update status of notice chart
12/01/03	TLG	1.30	Review Defendant's Objections and Responses to Plaintiffs' Interrogatories and Requests for Production of Documents
12/01/03	SAV	.70	Review documents produced by Smart Papers
12/02/03	TLG	6.50	Outline and draft Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages; review Defendant's Objections and Responses to Plaintiffs' Interrogatories and Requests for Production of Documents
12/02/03	SAV	4.30	Research good addresses of class members; review documents produced by Smart Papers
12/03/03	TLG	3.50	Review November 26, 2003 Declaration of Milton Lewis; outline and draft Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages
12/08/03	TLG	2.00	Draft and revise Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages
12/09/03	TLG	3.80	Draft and revise Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages
12/10/03	TLG	1.00	Assemble exhibits for Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages
12/11/03	TLG	1.50	Revise and assemble exhibits for Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages

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12/11/03	SAV	1.80	Review Administrative Record for reference to vacation issue
12/12/03	TLG	4.20	Finalize Plaintiff's Motion for Supplemental Notice and Memorandum in Support of Inclusion of Vacation Pay as Damages
12/12/03	SAV	1.00	Review Motion and add references to Exhibits; proof motion
12/15/03	TLG	2.70	Review Defendant's brief in support of its position that class members have already been paid vacation benefits
12/16/03	TLG	3.70	Review Defendant's brief in support of its position that class members have already been paid vacation benefits; draft and outline Plaintiffs' response memorandum in support of inclusion of vacation pay
12/17/03	TLG	4.20	Draft and revise Plaintiffs' response memorandum in support of inclusion of vacation pay
12/17/03	SAV	.20	Review status of notice report for good address re: class member Ivey; e-mail to C. Pence re: same
12/18/03	TLG	3.30	Draft and revise Plaintiffs' response memorandum in support of inclusion of vacation pay
12/18/03	SAV	1.70	Review Administrative Record for exhibits for response brief; update status chart with current addresses
12/19/03	TLG	4.70	Finalize and file Plaintiffs' response memorandum in support of inclusion of vacation pay
12/19/03	SAV	.80	Research: Sheperdize cases for brief
12/22/03	TLG	.70	Draft and revise letter to clients re: status and strategy

DATE	ATTY/PARA	TIME	DESCRIPTION
12/22/03	SAV	1.30	Preparation: copied four (4) briefs for co-counsel and clients; letter to clients re: same
12/23/03	TLG	.50	Letter to Keating, Theobald, Cooper, Hobbs, Dempsey and Smith re: status and strategy
12/23/03	SAV	1.30	Draft and revise correspondence to class members re: status; revised class representative letter
01/09/04	TLG	.70	Draft and revise letter to McElligott requesting copies of letters and objections sent to Barger re: Defendant's benefits calculations
01/09/04	SAV	1.50	File review for defendant's responses to discovery; emails to TLG and CP re: same; determination of location of class member using Locate Plus and Fast Data
01/14/04	TLG	2.50	Review Court's Order denying motion for supplemental notice and inclusion of vacation pay; conference with JCM re: same
01/14/04	JCM	1.80	Review Court Order denying supplemental notice and vacation pay; conference with TLG re: same
01/21/04	SAV	3.00	File review: class member benefits disputes; prepare chart re: benefit disputes
01/22/04	SAV	2.90	File review: class member benefits disputes; prepare chart of disputes and calculate disputed amounts
01/23/04	SAV	5.00	File review: class member benefits disputes; prepare chart of disputes and calculate disputed amounts
02/10/04	TLG	2.00	Draft Plaintiffs' Motion for Court Approval of Class Communication re: notifying them of the Court's ruling on vacation pay

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02/17/04	TLG	1.50	Review and revise Plaintiffs' Motion for Court Approval of Class Communication re: notifying them of the Court's ruling on vacation pay
02/17/04	SAV	.20	Telephone conference with class member regarding additional materials found evidencing miscalculation of start date; emails to TLG re: same
02/18/04	TLG	2.80	Finalize for filing the Plaintiffs' Motion for Court Approval of Class Communication re: notifying them of the Court's ruling on vacation pay
02/19/04	SAV	.10	Review correspondence of class member; file same and update status chart
03/01/04	TLG	1.50	Review of Defendant's Response to Plaintiffs' Motion for Court Approval of Class Communication
03/02/04	TLG	.80	Review Court's Order granting Plaintiffs' Motion for Court Approval of Class Communication; conference with JCM re: same; conference with SAV re: sending the letter to the class members
03/02/04	SAV	.20	Conference with TLG re: mailing status letter to the class
03/02/04	JCM	.20	Conference with TLG re: Court approval of class communication
03/03/04	TLG	.30	Conference with SAV re: mailing notice and calculations of benefits in Defendant's Exhibit A's
03/03/04	SAV	.50	Meeting with TLG re: class member mailing project; pull Exhibit A's to motion for TLG; update record re: status of Notice and benefits dispute
03/04/04	SAV	2.00	Prepare mailing to class members

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03/05/04	TLG	.50	Finalize letter to class members informing them of the Court's decision on their claims for vacation benefits
03/05/04	SAV	2.20	Prepare mailing to class members
03/09/04	SAV	1.20	Review correspondence received from class member (Bruce) re: disputed years of service; calculate disputed amount of class member and update chart re: same; update total disputed amount and updated chart re: same
04/20/04	SAV	.10	Telephone conference with class member re: status
04/21/04	SAV	.20	Review file for status of mailings; telephone call to C. Stanifer re: status
04/22/04	SAV	.10	Telephone conference with class member re: status
07/19/04	TLG	3.50	Outline Report to the Court re: class notice and need for final judgment entry; review file re: same
07/20/04	TLG	2.80	Draft Report to the Court re: class notice and need for final judgment entry
07/21/04	SAV	2.40	Prepare timeline for affidavit re: notice to class
07/22/04	SAV	5.30	Draft timeline of activity for affidavit; review affidavit in other case; prepare Excel chart re: severance pay amounts
07/26/04	TLG	3.70	Draft and revise Report to the Court re: class notice and need for final judgment entry; conference with JCM re: pension enhancement valuation and expert report re: same
07/26/04	JCM	.50	Conference with TLG re: pension valuation and Rosen work on report re: same

DATE	ATTY/PARA	TIME	DESCRIPTION
07/26/04	SAV	1.80	Review file of Barger letters and pull privileged materials; copy non-privileged Barger letters; pull and copy Exhibit A's re: Flex 6; revise Excel spreadsheets re: severance amounts
07/27/04	TLG	2.80	Draft and revise Report to the Court re: class notice and need for final judgment entry; compile exhibits and draft affidavits related to the Plaintiffs' Report; conference with JSG re: pension valuation
07/27/04	JSG	1.80	Conference with TLG; valuation analysis related to Flex 6 recipients
07/27/04	SAV	.70	Review/edit Affidavit; review status of notice chart for figures for Affidavit
07/28/04	TLG	5.20	Draft and revise Report to the Court re: class notice and need for final judgment entry; compile exhibits and draft affidavits related to the Plaintiffs' Report
07/28/04	JSG	1.70	Continued work on Flex 6 Benefit calculations
08/02/04	TLG	6.50	Start draft of Plaintiffs' Supplemental Motion for Fees and Expenses; review time records; update research; check status of authority cited in initial motion; conference with JCM re: pension calculations and expert work re: same
08/02/04	JCM	.70	Conference with TLG re: Rosen work on valuation of pension enhancement
08/03/04	TLG	1.80	Draft Plaintiffs' Supplemental Motion for Fees and Expenses
08/04/04	TLG	2.70	Draft Plaintiffs' Supplemental Motion for Fees and Expenses
08/05/04	TLG	3.20	Phone conferences with H. Rosen re: calculation of Flex Six Pension Enhancement value to class; review the pension enhancement calculations on the 17 Exhibit A's for the qualified class members; review the entire Retirement Plan; compile materials to transmit to H. Rosen and draft letter re: same; conference with JCM re: same

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08/05/04	JCM	.50	Conference with TLG re: expert valuation of the pension enhancement
08/06/04	TLG	1.50	Phone conferences with H. Rosen re: preliminary calculations and report to submit to the Court; identify missing information and conference with SAV re: follow-up to get the information on dates of birth and race information; conference with JCM re: same
08/06/04	JCM	.50	Conference with TLG re: expert analysis of pension enhancement
08/06/04	SAV	.20	Conference with TLG re: filling in missing information for the pension valuation
08/09/04	TLG	6.20	Review Retirement Plan and conference with H. Rosen re: preliminary report on Flex Six enhancement value; conference with SAV re: follow up information; review time entries and revise for supplemental Motion
08/09/04	SAV	2.40	Conference with TLG re: information for pension enhancement; review file for information re: Flex 6 class members' DOBs and race; LocatePlus searches; telephone conferences with class members re: knowledge of Flex 6 class members' DOBs and race; prepared chart re: same
08/10/04	TLG	8.50	Letter to defense counsel McElligott requesting information for the valuation of the Flex Six Pension Enhancement for certain members of the class; phone conference with H. Rosen office re: calculations and information; draft and revise letter to Defendant requesting the information necessary for the H. Rosen calculations; Review and revise time entries for Supplemental Motion for Fees
08/11/04	TLG	6.80	Phone conference with H. Rosen re: final calculations and remaining information yet to be produced by Defendant ; review and revise time entries for Plaintiffs' Supplemental Motion for Fees; review correspondence; review pleadings file; review time records; review discovery file; conference with SAV re: status of contacts with class members re: Flex Six Enhancement
08/11/04	SAV	.20	Conference with TLG re: contacting class members re: pension enhancement

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08/12/04	TLG	4.20	Review and revise and research interest issues re: Supplemental Motion for Fees; review previous years time entries for Supplemental Motion for Fees
08/13/04	TLG	3.70	Review time entries and prepare chart for submission to Court; conference with JCM re: same
08/13/04	JCM	1.80	Review time entries for submission to Court; conference with TLG re: same
08/16/04	TLG	2.50	Phone conference with Rosen re: pension valuation and interest computations; revise time entries for Supplemental Motion for Fees
08/17/04	TLG	2.80	Phone conference with Rosen re: pension valuation and interest computations; revise Supplemental Motion for Fees
8/18/04	TLG	4.30	Finalize and revise Supplemental Motion for Fees and exhibits; review Rosen report and insert into Supplemental Motion for Fees; finalize and revise Report to Court re: Class Notice and interest and final judgment entry